

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

DR. WHITNEY ROSS,)	
)	
DR. IAN ROSS,)	
)	
Plaintiffs,)	
)	
v.)	Case No.: 4:23-CV-1295-MTS
)	
RACHEL SEIGERT,)	
)	
JENKINS & KLING, P.C.,)	
)	
Defendants.)	

**PLAINTIFFS' MOTION FOR LEAVE TO FILE OMNIBUS BRIEF IN RESPONSE AND
FOR EXTENSION OF TIME**

COME NOW Plaintiffs Whitney Ross and Ian Ross ("Plaintiffs"), and for their Motion for Leave to File Omnibus Brief in Response and for Extension of Time state as follows:

1. On December 20, 2023, Defendants filed a Motion for Leave to Fille Supplemental Memorandum in Support of Motion to Dismiss including the proposed, 8-page memorandum.
2. On December 21, 2023, Defendants filed a 12-page Reply in support of their Motion for Sanctions.
3. Both filings include new (and odd) arguments, to which Plaintiffs need to respond and can do so in one filing.
4. Thus, to save the Court's resources and promote judicial economy, Plaintiffs request leave to file one omnibus brief in response to both filings.
5. Given the holiday season, Plaintiffs' counsel's travels to visit family, and Plaintiffs' and their counsel's desire to spend holiday time with family, Plaintiffs request thirty (30) days

from more recent of the two current due dates of January 3 and 4, 2024 (respectively), up to and including February 5, 2024.

WHEREFORE, Plaintiffs respectfully request that the Court enter an Order granting Plaintiffs' request for leave to file an omnibus brief and for an additional 30 days in which to file such brief, and for whatever further relief the Court deems necessary and just.

Dated: December 27, 2023

RESPECTFULLY SUBMITTED,

WURM, L.C.

/s/ William R. Wurm

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was electronically filed and served to counsel via the Court's e-filing system on this 27th day of December, 2023, addressed to the following attorney(s) of record:

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